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May 15, 2017

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Letter Regarding Upcoming Trial Dates

Dear Judge Glenn:

This is General Motors LLC's ("New GM") response to the Court's April 20, 2017 request for a list of pending cases against New GM involving Old GM-manufactured vehicles with upcoming trial dates through the end of October 2017 and potential Sale Order enforcement issues.

Attached as **Exhibit "A"** is a chart that contains (i) the name and location of the case, (ii) the vehicle make, model and year, (iii) the current trial date,¹ (iv) whether the case is part of an existing New GM motion to enforce, and (v) whether the case may be impacted by the resolution of 2016 Threshold Issues.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AS/sd

¹ The trial dates listed in the chart reflect the currently known trial dates as of the end of April 2017.

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EXHIBIT "A"
CASES WITH TRIAL DATES THROUGH OCTOBER 2017

<u>Case Name</u>	<u>Case Number /Jurisdiction</u>	<u>Vehicle Make / Model/Year</u>	<u>Trial Date</u>	<u>Subject to Prior Motion to Enforce</u>
<i>Pitterman, Bernard, et al. v. General Motors LLC</i>	Case No.: 3:14-cv-00967 (JCH) (U.S.D.C. D. Conn.)	2004 Chevrolet Suburban	7/5/2017	Yes [See ECF No. 13655]
<i>Moore, Jaimie Reda v. General Motors LLC, et al.</i>	Case No.: 2011-CP-42-3627 (Spartanburg Cty. Ct. of Comm. Pleas, SC)	1996 GMC Sonoma	Trial Scheduled for July 17, 2017 (but it may be continued until the fall of 2017).	Yes [See ECF No. 13655]
<i>Moore, James Walter v. General Motors LLC, et al.</i>	Case No.: 2011-CP-42-2625 (Spartanburg Cty. Ct. of Comm. Pleas, SC)	1996 GMC Sonoma	Trial Scheduled for July 17, 2017 (but it may be continued until the fall of 2017).	Yes [See ECF No. 13655]
<i>Szatkowski v. General Motors LLC et al.</i>	Case No. 2014-08274-0 (Court of Common Pleas Luzerne County, PA)	2006 Pontiac Solstice	July 24, 2017	No. ²
<i>Rounce, John v. General Motors</i>	Case No. : MJ-32246-CV-0000007-2017 (Magisterial District Court,	1998 Chevrolet Monte Carlo	July 26, 2017	No. ³

² The *Szatkowski* complaint was filed by an Ignition Switch Post-Closing Accident Plaintiff; it concerns a 2006 Pontiac Solstice, which is a Subject Vehicle. The complaint contains inappropriate allegations, including that New GM is the successor to Old GM, and refers to New GM when alleging conduct by Old GM. The plaintiff seeks punitive damages on some of the Counts in the complaint but it is unclear whether the theory for punitive damages is based on a successor liability theory. Accordingly, this lawsuit may be impacted by the 2016 Threshold Issues.

³ The *Rounce* complaint appears to only assert claims that would, if proven, be considered Assumed Liabilities. New GM believes that the *Rounce* lawsuit will not be impacted by the 2016 Threshold Issues, but includes it herein for the sake of completeness.

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<u>Case Name</u>	<u>Case Number /Jurisdiction</u>	<u>Vehicle Make / Model/Year</u>	<u>Trial Date</u>	<u>Subject to Prior Motion to Enforce</u>
	Delaware County, PA)			
<i>Definis, Catherine, et al. v. General Motors Corp., et al.</i>	Case No. 2015:1429 (Court of Common Pleas, Philadelphia Cty., PA)	2006 Hummer H3	8/7/2017 (Trial Ready Date, but not actual date of trial)	No ⁴
<i>Culclager, Dexter, Jr. et al. v. General Motors LLC, et al.</i>	Case No.: 2015-CA-002741 (Duval County, FL)	2007 Chevrolet Tahoe	9/11/2017	No ⁵
<i>Jones, Linda Franklin, et al. v. General Motors LLC, et al.</i>	Case No.: 16-2015-CA-002920-XXXX-MA (Duval County, FL)	2007 Chevrolet Tahoe	9/11/2017	No ⁶
<i>Neal, Bridgette Nicole, et al. v. General Motors LLC</i>	Case No.: 2:14-CV-633 (U.S.D.C. N. Div. M.D. AL)	2002 Pontiac Grand Am	September / October 2017	Yes [See ECF No. 13655]
<i>Haynes-Tibbetts, Constance, et al. v. General Motors LLC, et al.</i>	Case No.: D-202-CV-2015-04918 (Second Judicial District Court, Bernalillo County, NM)	2005 Cadillac SRX	October 2017	Yes [See ECF No. 13633]

⁴ The *Definis* complaint contains inappropriate allegations, including treating Old GM and New GM as one entity. It is further unclear if the Non-Ignition Switch Post-Closing Accident Plaintiff is actually seeking to assert Independent Claims against New GM. The complaint does not request punitive damages. Accordingly, it is unclear if this lawsuit is impacted by the 2016 Threshold Issues.

⁵ The *Culclager* complaint contains inappropriate allegations, including referring to New GM for Old GM's conduct. It is further unclear if the Non-Ignition Switch Post-Closing Accident Plaintiff is actually seeking to assert Independent Claims against New GM. The complaint does not request punitive damages. Accordingly, it is unclear if this lawsuit is impacted by the 2016 Threshold Issues.

⁶ The *Jones* lawsuit is a companion case to the *Culclager* lawsuit, and the complaints are substantially similar.

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<u>Case Name</u>	<u>Case Number /Jurisdiction</u>	<u>Vehicle Make / Model/Year</u>	<u>Trial Date</u>	<u>Subject to Prior Motion to Enforce</u>
<i>Dodson v. General Motors LLC</i>	MDL 2543	2004 Cadillac CTS	October 30, 2017	No. ⁷

⁷ The plaintiff in the *Dodson* lawsuit is a Non-Ignition Switch Post-Closing Accident Plaintiff and the complaint attempts to assert Independent Claims against New GM. The complaint seeks exemplary damages. Accordingly, the *Dodson* lawsuit may be impacted by the 2016 Threshold Issues.